EXHIBIT 1

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Victor Otten

From:

Richard P. Dieffenbach < RDieffenbach@veatchfirm.com>

Sent:

Thursday, January 12, 2017 6:51 PM

To:

Victor Otten

Cc:

Robert Cooper; Rob Mackey; John Worgul; John E. Stobart

Subject:

Joint Statement for Discovery motion

Attachments:

PLD-joint report re magistrates minute order re Blakeman's mtc.doc

Mr. Otten

Attached is the Defendant's portion of the Joint Statement relating to Mr. Blakeman's Motion to Compel. Please provide Plaintiffs' portion and any supplemental memorandum and return it to me tomorrow so we can file it with the court in keeping with the time requirements. Thank you.

Richard P. Dieffenbach, Esq.

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